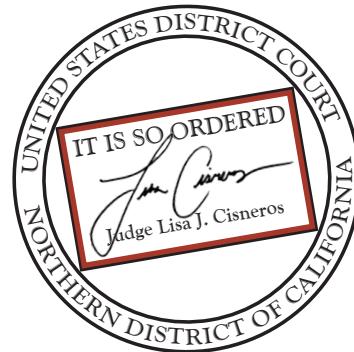




Sara M. Peters
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November 25, 2025

Hon. Lisa J. Cisneros
United States Magistrate Judge for the Northern
District of California San Francisco Courthouse,
Courtroom G, 15th Floor
450 Golden Gate Ave.
San Francisco, California 94102



Re: *Oksana Lopez, et al. v. Harley-Davidson, Inc.*,
No. 3:24-cv-04320-RS-LJC
Joint Discovery Agreement

Dear Judge Cisneros:

Following the Court's issuance of its October 24, 2025 Order (ECF 69), and the Court's November 14, 2025 Order (ECF 75) referring the issues presented in Harley-Davidson's Motion for Relief From Nondispositive Pretrial Order of Magistrate Judge (ECF 73) to Magistrate Judge Lisa J. Cisneros for resolution, the parties were ordered to appear in person for a hearing held on November 20, 2025 (ECF 80). Counsel for the parties appeared at the hearing and some oral argument was held. The Court clarified that the Court's October 24, 2024 Order (ECF 69) had not been limited to only the discovery requests itemized in the exhibit attached to the parties' joint letter. The Court instructed counsel for the parties to continue to meet and confer to attempt to resolve the issues that were before the Court. The parties' counsel met and conferred as instructed for a significant length of time. The parties worked diligently to reach a resolution of the issues before the Court and were able to resolve them. The parties advised the Court that they would provide the terms and details of the resolutions they reached in writing to the Court by November 25, 2025.

The resolutions described below are intended to resolve all issues and disputes raised or at issue during the November 20, 2025 hearing, in the October 24, 2025 Order (ECF 69), in the October 15, 2025 Joint Discovery Dispute Letter (ECF 62), and in the November 14, 2025 Joint Dispute Letter (ECF 77). The parties respectfully ask the Court to enter an order in accordance with the resolutions described below. Those resolutions reached by the parties are as follows:

Requests Subject to Further Search For and Production of Documents, if any: The Requests that are subject to these resolutions are Plaintiffs' Requests for Production numbers 7, 9, 26-29, 39, 42, 47, and 50. The issues before the Court and the obligations set forth herein do not apply to any other requests, and these identified requests are the only requests that are subject to an order to be entered by the Court regarding these resolutions.

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Production timing: Production of further documents to occur no later than December 11, 2025.

Scope of further searches for and production of documents, if any: Harley-Davidson's search for and production of responsive documents, if any, for the requests identified above shall be according to the following scope of parts and/or Harley-Davidson motorcycle models:

For Plaintiffs' request for production numbers 7, 9 and 39:

(1) Warranty claims regarding the subject spring, part number 50005-85A: Harley-Davidson must expand its prior production to include all responsive warranty claims relating to part number 50005-85A and any model year 2007 Harley-Davidson motorcycle or prior model year Harley-Davidson motorcycle that was produced with part number 50005-85A. Harley-Davidson may no longer have warranty claims for certain older model years, but will search for and produce available responsive documents. Model year 2008 and later model year motorcycles are not within the scope.

(2) Warranty claims and customer contacts for the jiffy stand: Harley-Davidson must expand its prior production to include all responsive documents related to any of the following jiffy stand part nos., 50185-04, 50185-04A, 50185-04B, and 50185-04C, when those parts were used in any model year 2006-2011 Harley-Davidson motorcycle(s). Model year 2012 and later model year motorcycles are not within the scope.

For Plaintiffs' requests for production numbers 26-29:

Harley-Davidson must expand the scope of its production to include responsive documents, if any, that relate to testing applicable to any of the following versions of the jiffy stand: 50185-04, 50185-04A, 50185-04B, or 50185-04C, and Harley-Davidson must not limit its production to the model year motorcycle at issue in this case (the 2007 XL 1200L Sportster), but must include responsive documents, if any, regarding the jiffy stand (part 50185-04 and its A, B, C variants) used on any model year Harley-Davidson motorcycle that was produced with one of these part numbers through model year 2022. However, only documents that specifically relate to a jiffy stand part number are required, and it is not sufficient that a document relates to a different Harley-Davidson motorcycle model that comes with a jiffy stand part no. 50185-04 or its A, B, C variants if the document does not relate to the jiffy stand.

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For Plaintiffs' requests for production numbers 42:

Harley-Davidson must expand the scope of its search for and production of responsive documents, if any, to include responsive documents that relate to any of the following jiffy stand part numbers: 50185-04, 50185-04A, 50185-04B, or 50185-04C, and Harley Davidson must not limit its production to the model year motorcycle at issue in this case (the 2007 XL 1200L Sportster), but must include responsive documents regarding the jiffy stand (part 50185-04 and/or its A, B, C variants) regardless of the model year involved through model year 2022. However, only responsive documents that specifically relate to a jiffy stand part number are required, and it is not sufficient that a document relates to a different Harley-Davidson motorcycle model that comes with a jiffy stand part no. 50185-04 or its A, B, C variants if the document does not relate to the jiffy stand.

For Plaintiffs' requests for production numbers 47:

Harley-Davidson must expand the scope of its production to include responsive documents, if any, that relate to responsive testing (testing conducted on or before January 1, 2008) of any of the following versions of the jiffy stand: 50185-04, 50185-04A, 50185-04B, or 50185-04C, and Harley-Davidson must not limit its production to the model year motorcycle at issue in this case (the 2007 XL 1200L Sportster), but must include responsive documents regarding the jiffy stand (part 50185-04 and/or its A, B, C variants) regardless of the model year involved subject to the January 1, 2008 limitation.

For Plaintiffs' requests for production number 50:

Harley-Davidson must expand the scope of its production to include responsive documents, if any, that relate to any of the following versions of the jiffy stand: 50185-04, 50185-04A, 50185-04B, or 50185-04C, and Harley-Davidson must not limit its production to the model year motorcycle at issue in this case (the 2007 XL Sportster), but must include responsive documents regarding the jiffy stand (part 50185-04 and its variants) regardless of the model year involved through model year 2022.

* * * * *

I, Sara M. Peters, lead trial counsel for Plaintiffs, attest that lead counsel for both parties met and conferred by videoconference on the issues contained in this letter.

/s/
Sara M. Peters
Counsel for Plaintiffs

/s/
Paul Nystrom
Counsel for Defendant